

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Birim Group, LLC

A California Limited Liability Company,
Assignee,

Plaintiff,

vs.

Paa Kwesi Nduom, a.k.a. Dr. Paa Kwesi Nduom, Papa Kwesi Nduom, Kwesi P. Nduom, an individual; **GN Bank**, an Illinois Federally-chartered Financial Institution; **International Business Solutions, LLC**, a Virginia Limited Liability Company; **et al.**

Defendants.

CASE NO.: 1:20-cv-07198

PLAINTIFF'S MOTION TO FILE BRIEF IN EXCESS OF PAGE LIMIT

PLAINTIFF BIRIM GROUP, LLC, by and through its attorneys of record and pursuant to Federal Rules of Civil Procedure, Rule 6 (c) and Local Rule 7.1 respectfully requests the court's permission to file a brief in excess of Local Rule 7.1 fifteen page limit. Plaintiff's motion is supported by the affidavit of undersigned counsel, attached hereto and made a part hereof.

**Plaintiff Counsel's Affidavit In Support of Motion To File Brief in Excess of
Page Limit**

I, **KWASI ASIEDU**, declare as follows:

1. I am counsel for Plaintiff, Birim Group, LLC in the above captioned matter. I swear this affidavit in support of plaintiff's request to file a brief in excess of the 15-page limit mandated by Local Rule 7.1
2. If I were called as a witness, I could and would testify to the matters herein, which matters are known to me personally, except as to those stated upon information and belief, and as to those facts, I believe them to be true.
3. On or about April 5, 2021, defendants filed and served on plaintiff a Motion to Dismiss the complaint. Defendants' motion, exclusive of Exhibits, is 26 pages long and raises several complex issues.
4. Because of the multiple complex issues raised in defendants's motion, plaintiff will need additional pages to fully and properly respond to each of the issues raised in defendants' Motion to Dismiss.
5. Plaintiff's response is due on May 20, 2021. Plaintiff respectfully requests that this court grant it permission to file its opposition not to exceed 35-pages, exclusive of Exhibit.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 17th day of May, 2021.

Dated: May 17, 2021

Respectfully submitted,

By: /s/Kwasi A. Asiedu

Kwasi A. Asiedu (CA Bar No. 133698)

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Attorneys for Birim Group, LLC

CERTIFICATE OF SERVICE

I certify that on May 17, 2021, I electronically filed the foregoing **PLAINTIFF’S MOTION TO FILE BRIEF IN EXCESS OF PAGE LIMIT** with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel and parties of record.

By: /s/ **Shelly D. McMillan**